June 27, 2014

Charlie D. Mattingly
President
The Nova Telephone Company
c/o VNC Enterprises
235 Dennard Street
Longview, TX 75605
P.O. Box 733
Judson, TX 75660
(903)663-0099

Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

### RE: REQUEST FOR CONFIDENTIAL TREATMENT:

Connect America Fund; High Cost Universal Service Support IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

### Dear Ms. Dortch:

Please find attached with this letter a request for confidential treatment for portions of Information submitted with our company Form 481 along with four copies. Contemporaneously, we are filing a copy of the redacted Form 481, with redacted attachments, via ECFS. This information has also been filed with our state commission and electronically submitted, and certified, with the Universal Service Administration Company. If you have any questions or concerns with the attachments, please contact Charles Curtis at Charles curtis@contaegis.com or by phone at 252-514-2203.

Sincerely,

Charlie Mattingly

Cc: file

## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of	}	
Connect America Fund	WC Docket No. 10-9	0
	) WC Docket No. 07-1	35
High-Cost Universal Service Support	) WC Docket No. 11-4	2
	) WC Docket No. 05-3.	37
Lifeline and Link Up Reform	) WC Dacket No. 03-1	09
	) CC Docket No. 01-92	
	) CC Docket No. 96-45	;
	) GN Docket No. 09-53	1
	) WT Docket No. 10-2	08

### REQUEST FOR CONFIDENTIAL TREATMENT

The Nova Telephone Company ("Filer") requests that the portions of its Form 481 pertaining to its Five Year Plan in the Service Quality Improvement Reporting, its Tribal Land Offerings documentation and its Rate of Return Additional Documentation (RUS Annual Report) be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. Sections 0.457, 0.459, and related provisions of the Freedom of Information Act ("FOIA"), including 5 U.S.C. Section 552(b)(4) ("Exemption 4"). Form 481 contains information regarding the Filer's capital expenditure budgets, detailed network information as well as sensitive financial information filed in the Rate of Return Documentation. Release of such information would supply its competition sensitive commercial information that would undermine its ability to serve its customers effectively. Such information is not customarily disclosed to the public or made available within the telecommunications industry. Therefore, the Filer requests confidentiality of these respective portions of its Form 481 filing be granted. Support for the Filer's request for confidential treatment pursuant to FCC rules in Section 0.459(b) is provided as follows:

## FILER'S FORM 481 SATISFY THE REQUIREMENTS OF SECTION 0.459 OF THE COMMISSION'S RULES

The material the Filer seeks confidentiality qualifies for the requirements outlined in Section 0.459 if the FCC's rules. As will be demonstrated, the Filer has satisfied all the elements of this section, concluding that disclosure of this information would be harmful to the Filer.

(1) Identification of the specific information for which confidential treatment is sought. The Filer requests confidential treatment for the portions of the Form 481 required by 47 C.F.R. Section 54.313(a)(2) and (4). The Form bears the legend "CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO.'S 10-90, 07-135, 05-337, 03-109, CC DOCKETS 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATION COMMISSION." The specific information considered confidential include: 1) The Filer's S year capital budget and network information associated with Service Quality improvement Reporting (100), 2) ROR Additional Documentation which represents financial reports for calendar year 2013 (3005).

- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission. The information is required to be produced annually in accordance with 47 C.F.R. Section 54.313(a). The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42.
- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged. The information requested for confidential treatment is information not customarily released to the public. Release of this information would have the effect of substantial harm to the competitive position of the Filer.
- (4) Explanation of the degree to which the information concerns a service that is subject to competition. All of the services provided by the Filer are subject to competition.
- (5) Explanation of how disclosure of the information could result in substantial competitive harm. Identification of network details could enable wrongdoers the ability to compromise network reliability to customers. In addition, competitive entities in the Filer's area would have access to sensitive network, strategic and financial details that would hamper the Filer's ability to effectively compete.
- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure. The information filed is not customarily released to the public or publically made available within the telecommunications industry. The information is also only released within internal circulation, including its attorneys, consultants and engineers, held to confidentiality agreements. The request as well as the associated documents subject to it, are filed both paper copy as well as electronically.
- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. None of the information requesting confidential treatment is available to the public and have not been disclosed to parties unless those parties are engaged to perform services for the Filer, under nondisclosure.
- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure. Due to the fact that the nature of the information being filed is sensitive in terms of competitive and public safety concerns, the Filer requests that confidential treatment be granted indefinitely.

### II. CONCLUSION

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's rules, the Filer requests that the portions of Form 481 relating to those particular items listed in 1.1, above, be treated as confidential under the Commission's rules and precedent and withheld from public inspection and that any distribution of them within the Commission should be limited, in accordance with the reasons stated for confidential request. In the case where any person, party or entity wishes to access any of this information, the Filer requests immediate notification so it can have the opportunity to oppose the request or consider any other action it deems necessary to protect both its network, strategic and financial interests and the interest of the customers it continues to serve.

Respectfully Submitted,

Charlie D. Mattingly

President

The Nova Telephone Company

c/o VNC Enterprises

235 Dennard Street

Longview, TX 75605

P.O. Box 733

Judson, TX 75660

(903)663-0099

June 27, 2014

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<039>	Contact Email Address - Email Address of purson Identified in data line <030>	otechnuleScontaggis.gcm
<110>	Has your company received its ETC certification from the FCC?	(yes / no.) O •
<111>	If your answer to Line <110> is yes, do you have an existing §34,202(a) "5 year plan" filed with the FCC?	(yes / no ) O O
<112>	If your answer to Line <1.11> is yes, then you are required to file a progress report, on line <1.12> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the PCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your con CETC which only receives frozen support, your progress report is only required to address voice telephony service.	1pany Isa
	Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets	
<114>	Report how much universal service (USF) support was received	
<115>	How (USF) was used to improve service quality	
<116>	How (USF)was used to improve service coverage	
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<117>	How (USF) was used to improve service capacity	

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Page 3

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or the we	bsite listed, on line 1220, contains the required information pursuant to		
6 54.422	(a)(2) annual reporting for ETCs receiving low-income support, carriers must		
annually	reports		
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<ul> <li>2017&gt; 3rd year Broadband Service Certification</li> <li>2018&gt; 5th year Broadband Service Certification</li> <li>2019&gt; Interim Progress Certification</li> <li>2020&gt; Please check the box to confirm that the attached document(s), on line 2021, contains the required information gursulant to § 54.313 (e)(3)-jii], as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.</li> <li>2021&gt; Interim Progress Community Anchor Institutions</li> </ul>				3	
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40159	Study Aven Name	THE KOVA TRE CO
<050>	Program Year	2615
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Curtis
<135>	Contact Telephone Number - Number of prison identified to data line <0305	2525142263 mxt.
<033>	Contact fimal! Address - Email Address of person identified in data line 4030>	staphanie@contreg"s.one

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

sertify that I am an officer of the reporting sarrier; my respon ecipients; and, to the best of my knowledge, the information	ibilities include ensuring the accuracy of the annual reporting requirements for universal service support eported on this form and in any attachments is accurate.
Norte al Reporting Carrier:	
ignatura of Authorized Officer:	Bale
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Page 15

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<u76></u76>	Program Years	2915	
<0HU>	Contact Name - Person USAC should contact regarding this data	Stephanie Curtis	
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<039>	Contact English Address - Email Address of person identified in data lige costs	stephymia@usntacqis.com	

### TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS PRING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

certify litef (Nome of Agent) also certify that I am an officer of the reporting certies; my respect agent; and, to the best of my knowledge, the reports and data pro-	Is authorized to exhibit the information reported on behalf of the reporting carrier, still these include consuming the accuracy of the entired data reporting requirements provided to the authorized added to the authorized agent is accurate.
Name of Authorized Agent:	
Name of Reporting Carrier: TRE MOVA TEL CO	
Signatuse of Authorized Officer: CERTIFIED ONLINE	Daţns
Printed name of Authorized Officer:	
Title is: position of Authorized Officers	
Telephone number of Authorized Officers	
Study Alea Code of Reporting Covice: 300644	Filling Due Oate for this form: 07/01/2014

### TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to	File Annual Reports for CAF o	r 🛘 Recipients on Bahi	if of Reporting Confer	
as agent for the reporting carrier, certify that tark authorized to submit the data reported herein based on data provided by the reporting sertion				sve grovided
Name of Reporting Carrier: THE NOVA, YELL CO	,			
Type of Authorized Agent or Employee of Agent: Charles D. Matt	ar.gly			
Signature of Authorized Agent or Employee of Agent: CNR-12120 CSD.	INE .		Date:	
Viglet name of Archaetted Agent or Employee of Agent Charles D.	Pattingly		- 302	. —
Title or postton of Acthorized Agent of Employee of Agent Principles				
claphone curaber of Authorized Agent or Employee of Agent: 90366503	99 wat.			
Rody Area Code of Reparting Carriet: 300 644	Filing Due Date for this form:	01/01/2014		

Attachments

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THE NOVA TELEPHONE COMPANY, INC.

2014 FIVE YEAR PLAN IN ACCORDANCE WITH SECTION 54.202(a)(1)(ii) OF FCC RULES



COMPANY SAC

NOVA TELEPHONE COMPANY 300644 YEAR COMPLETED 2014

WIRE CENTER 1 WIRE CENTER 2 WIRE CENTER 3 WIRE CENTER 4 WIRE CENTER 5 WIRE CENTER 6 WIRE CENTER 7 WIRE CENTER 8 WIRE CENTER 9 WIRE CENTER 10

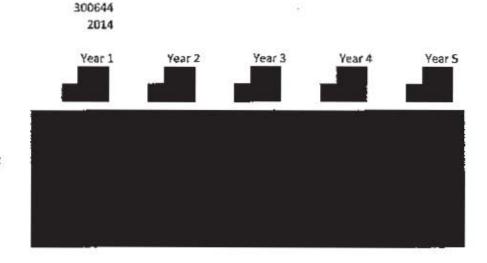
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Square Miles Population

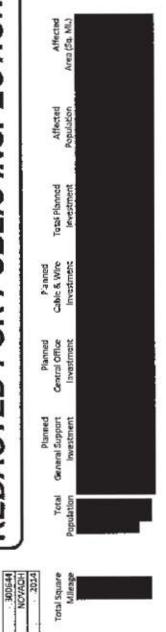
Planned GS Investment
Planned COE Investment
Planned Cable & Wire Investment
Total Planned Investment

Affected Area (Sq. Mi.) Affected Population



SAC WIRE CENTER YEAR FILED

Year 1

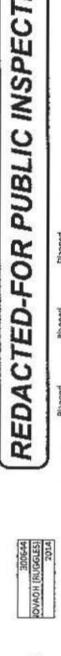


% Subs

% Subs REDACTED-FOR PUBLIC INSPECTION Area (Sq. MI.) Affected Population Yotal Planned Investment Planned Cable & Wire Investment Planned Central Office Investment Planned General Support Investment Total Population SVAOH (SULLIVAN) Total Square Mileage

> SAC WIRE CENTER YEAR FILED

% Area





244	Cable & Wire trivestment	(Mar. 14)	fotal Planeed Investment	Population	Affected Area (Sq. MF.)	Stubs &
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### The Nova Telephone Company

Study Area Code: 300644

### Response to Line 510 – Service Quality Standards and Consumer Protection Rules

<u>Surpasses PUC minimum service quality standards</u> – The Nova Telephone Company ("Filer") hereby certifies that its voice service surpasses the minimum standards required by the Public Utilities Commission of Ohio ("PUCO") for eligible telecommunications carriers. Over the history of the Filer's provision of voice services to its customer, it has consistently exceeded those minimum standards.

<u>Publically available rates, terms and conditions</u> - Once more, the Filer's rates, terms and conditions for voice service are publically available through OCC approved local exchange tariffs.

<u>Protection of consumer information</u> - The Filer complies with the Federal Communications Commission Consumer Proprietary Network Information ("CPNI") rules (47 C.F.R. Sections 64.2001-64.2011). The compliance is assured through certification for CPNI compliance by March 1 of each year, in addition to its own internal company procedures. The Filer also complies with all consumer protection rules applicable by State law.

Broadband service rates, quality service standards - The Filer offers wholesale broadband to an unaffiliated third party, rather than retail to its end users. It assures the third party that it provides speeds associated with service plans purchased through its interstate tariff. For example, for lines that subscribe at speeds up to a download speed and upload speed, those speeds are provided. However, those speeds are based on a 'best effort' basis, due to the fact there are several aspects of the broadband network, outside of the Filer's control, that can effect throughput speeds. The interstate tariffs are publically available for rates, terms and conditions. Once more, the Filer has internal procedures to assure that quality of service to broadband customers exceeds expectations. Therefore, although there are no current broadband service quality standards and consumer protection rules, the Filer discloses its rates, terms and conditions of service to its customers. Lastly, the Filer complies with applicable federal and state customer protection standards for all businesses in Ohio.

### The Nova Telephone Company

Study Area Code: 300644

### Response to Line 610 - Ability to Function in Emergency Situations for Voice and Broadband

The Nova Telephone Company ("Filer") certifies that it is able to function in emergency situations as set forth in both federal and state regulations.

<u>Power</u> - The Filer's network is designed to remain functional in emergency situations where no external power is available. In such cases, the Filer has eight hours of battery backup power for its wire center and field electronics locations. The wire center is also equipped with backup power generators and automatic transfer switches. In addition, the Filer has access to mobile backup generators in case of backup power failure.<sup>1</sup>

Routing and Spikes — The Filer has alternate routes configured in each of its local switch to assure that when the primary routes are down, traffic is re-routed to alternate routes and facilities. In addition, the Filer has overflow routes where traffic spikes may compromise the primary route traffic flows.

<u>Procedures for voice and data</u> - The Filer has internal procedures for emergency situations which includes emergency operations planning. Such procedures and network infrastructure utilized for emergency situations is offered as such for both voice and broadband services.

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<sup>&</sup>lt;sup>1</sup> Section 54.202(a)(2)

### The Nova Telephone Company

Study Area Code: 300644

### Response to Line 1010 - Voice Services Rate Comparability

The Wireline Competition Bureau has released its reasonably comparable voice benchmark rate including local residential rate, interstate end user common line charge, any applicable state end user common line charges, mandatory extended area service charges and state universal service charges. The Filer certifies that the combination of all applicable charges stated herein fall below the federal benchmark rate. The Filer discloses its rates, by exchange, in line 700 of the Form 481, demonstrating its rate levels compared to the federal benchmark.



1155 Kelly Johnson Blvd. Sulte 303 Colorado Springs, CO 80920-3990 Phone: 719.599.3664 Fex: 719.599.7059 www.kiesling.com







